

U.S. Department of Justice
Washington, DC 20530

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Registration Statement
Pursuant to the Foreign Agents Registration Act of
1938, as amended

I--REGISTRANT

1. Name of Registrant

High Lantern Group LLC (Information provided relating to activity from October, 2019, to March, 2020)

2. Registration Number (To be assigned by the FARA Unit)

6967

3. Primary Business Address

685 3rd Ave, 22nd Floor
New York, NY 10017

4. If the registrant is an individual, furnish the following information:

(a) Residence address(es)

(b) Nationality

(c) Year of birth

(d) Present citizenship

(e) If present citizenship not acquired by birth, state when, where and how acquired

(f) Occupation

5. If the registrant is not an individual, furnish the following information:

(a) Type of organization: Committee ☐ Association ☐ Partnership ☐ Voluntary group ☐
Corporation ☐ Other (specify) Limited Liability Company

(b) Date and place of organization

July 15, 2009, Colorado

(c) Name of responsible individual
(e.g., officer, director or partner)

Robert Gluck, Daniel Casse, and Michael Hodin

(d) Other business address(es), if any, including
locations of branch or local offices

Washington, DC; Philadelphia, PA; Asheville, NC; Geneva, Switzerland

(e) If a membership organization, provide number of members

(f) List all partners, officers, directors or persons performing the functions of an officer or director of the registrant.

Name	Residence Address	Citizenship	Position
Robert Gluck, American, Managing Partner			
Daniel Casse, American, Managing Partner			
Michael Hodin, American, Managing Partner			

Residence addresses separately provided to the FARA office

(g) Which of the above named persons renders services directly in furtherance of the interests of any of the foreign principals?

Name	Foreign Principal(s)	Services
Robert Gluck, PDVSA, corporate communications consulting		

(h) Describe the nature of the registrant's regular business or activity.

Corporate communications consulting

(i) Give a complete description of the ownership and control structure of the registrant.

High Lantern Group LLC is a limited liability corporation incorporated in Colorado. At the time of the services described in this registration, HLG LLC was 49.5% owned by DS Hopkins Holdings LLC (based in Colorado). The remaining 50.5% of shares were divided among the managing partners and other employees, all U.S. citizens. HLG LLC was controlled by a board of managers but operated day to day by the managing partners, all U.S. citizens.

6. List all individuals, other than those listed in Item 5(g), who render services or will render services to the registrant directly in furtherance of the interests of any foreign principal(s) in other than a clerical, secretarial, or in a related or similar capacity.

Name	Residence Address	Foreign Principal(s)	Services
Charles McGinnis, PDVSA, Corporate Communications Support			
Kevin Stach, PDVSA, Corporate Communications Support			

Residence addresses separately provided to the FARA office

II--FOREIGN PRINCIPAL

7. List every foreign principal¹ for whom the registrant is acting or has agreed to act.

Foreign Principal	Foreign Principal Address
Ad Hoc Board of Petroleos de Venezuela, S.A. ("PDVSA"), Venezuela through CITGO Petroleum Corporation, 1293 Eldridge Parkway, Houston TX 77077	

III--ACTIVITIES

8. In addition to the activities described in any Exhibit B to this statement, will the registrant engage or is the registrant engaging now in activity or rendering services on its own behalf which benefits any or all of its foreign principals?

Yes ☐ No ☒

If yes, describe fully.

Foreign Principal	Activities/Services

IV--FINANCIAL INFORMATION**9. (a) RECEIPTS-MONIES**

During the period beginning 60 days prior to the date of the registrant's obligation to register² under FARA, has the registrant received from any foreign principal named in Item 7 of this statement, or from any other source, for or in the interests of any such foreign principal, any contributions, income, or money either as compensation, or for disbursement or otherwise?

Yes ☒ No ☐

If yes, set forth below in the required detail and separately for each such foreign principal an account of such monies.³

Foreign Principal	Date Received	From Whom	Purpose	Amount
PDVSA, Oct. 18, 2019, CITGO Petroleum Corporation,			Payment of fees,	\$80,000
PDVSA, Nov. 21, 2019, CITGO Petroleum Corporation,			Payment of fees,	\$80,000
PDVSA, Jan. 3, 2020, CITGO Petroleum Corporation,			Payment of fees,	\$80,000
PDVSA, Jan. 29, 2020, CITGO Petroleum Corporation,			Payment of fees,	\$65,000
PDVSA, Feb. 21, 2020, CITGO Petroleum Corporation,			Payment of fees,	\$65,000
PDVSA, March 16, 2020, CITGO Petroleum Corporation,			Payment of fees,	\$65,000
PDVSA, April 17, 2020, CITGO Petroleum Corporation,			Payment of fees,	\$65,000

* These payments relate to the services performed from October, 2019, through March, 2020

¹ The term "foreign principal," as defined in Section 1(b) of the Act, includes a foreign government, foreign political party, foreign organization, foreign individual and, for the purpose of registration, an organization or an individual any of whose activities are directly or indirectly supervised, directed, controlled, financed, or subsidized in whole or in major part by a foreign government, foreign political party, foreign organization or foreign individual.

² An agent must register within 10 days of becoming an agent, and before acting as such.

³ A registrant is required to file an Exhibit D if he collects or receives contributions, loans, monies, or other things of value for a foreign principal as part of a fundraising campaign. There is no printed form for this exhibit. (See Rule 201(e), 28 C.F.R. § 201(e)).

(b) RECEIPTS-THINGS OF VALUE

During the period beginning 60 days prior to the date of the registrant's obligation to register⁴ under FARA, has the registrant received anything of value⁵ other than money, from any foreign principal named in Item 7 of this statement, or from any other source, for or in the interests of any such foreign principal?

Yes ☐No ☒

If yes, furnish the following information:

Foreign Principal	Date Received	From Whom	Purpose	Thing of Value
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10. (a) DISBURSEMENTS-MONIES

During the period beginning 60 days prior to the date of the registrant's obligation to register⁶ under FARA, has the registrant disbursed or expended monies in connection with activity on behalf of any foreign principal named in Item 7 of this statement or transmitted monies to any such foreign principal?

Yes ☒No ☐

If yes, set forth below in the required detail and separately for each such foreign principal named including monies transmitted, if any, to each foreign principal.

Foreign Principal	Date	Recipient	Purpose	Amount
PDVSA, Jan. 29, 2020, travel expenses,				\$4271.39
PDVSA, Feb. 4, 2020, travel expenses,				\$684.78
PDVSA, April 17, 2020, travel expenses,				\$3288.80

(b) DISBURSEMENTS-THINGS OF VALUE

During the period beginning 60 days prior to the date of the registrant's obligation to register⁷ under FARA, has the registrant disposed of any thing of value⁸ other than money in furtherance of or in connection with its activities on behalf of any foreign principal named in Item 7 of this statement? Yes ☐ No ☒

If yes, furnish the following information:

Foreign Principal	Date	Recipient	Purpose	Thing of Value
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(c) DISBURSEMENTS-POLITICAL CONTRIBUTIONS

During the period beginning 60 days prior to the date of the registrant's obligation to register⁹ under FARA, has the registrant (or any short form registrant) made any contribution of money or other thing of value from its own funds and on its own behalf in connection with an election to any political office or in connection with any primary election, convention, or caucus held to select candidates for any political office? Yes ☐ No ☒

If yes, furnish the following information:

Date	Donor	Political Organization/Candidate	Method	Amount/Thing of Value
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4, 6, 7 and 9 See Footnote 2, on page 3.

5 and 8 Things of value include but are not limited to gifts, interest-free loans, expense-free travel, favored stock purchases, exclusive rights, favored treatment over competitors, "kickbacks", and the like.

V-INFORMATIONAL MATERIALS¹⁰

11. Prior to the time of filing this statement,¹¹ has the registrant prepared, disseminated, or caused to be disseminated, any informational materials on behalf of any foreign principal listed in Item 7 of this statement?

Yes ☒ No ☐

If yes, identify each foreign principal and attach the informational materials.

Foreign Principal	Informational Materials Attached	Type
PDVSA	Fact sheet attached	
PDVSA	Op-ed attached	

12. (a) Will the activities of the registrant on behalf of any foreign principal include the preparation or dissemination of informational materials?

Yes ☒ No ☐

(b) If yes, identify each foreign principal and respond to the remaining items in this section.

Ad Hoc Board of Petroleos de Venezuela, S.A. ("PDVSA"), through CITGO Petroleum Corporation

13. Has a budget been established or specified sum of money allocated to finance the registrant's activities in preparing or disseminating informational materials? Yes ☒ No ☐

If yes, identify each foreign principal, and specify the period of time and the amount.

Foreign Principal	Period of Time	Amount

14. Will any individuals or organizations, including public relations firms or publicity agents, participate in the preparation or dissemination of such informational materials?

Yes ☒ No ☐

If yes, furnish the names and addresses of such individuals or organizations.

Name	Address	Foreign Principal(s)
High Lantern Group LLC	685 3rd Ave, 22nd Floor, New York, NY 10017	PDVSA

15. Activities in preparing or disseminating informational materials will include the use of the following:

- ☒ Magazine or newspaper
 ☐ Advertising campaigns
 ☐ Press releases
 ☐ Pamphlets or other publications
☐ Lectures or speeches
 ☐ Radio or TV broadcasts
 ☐ Motion picture films
 ☐ Letters or telegrams
☒ Email
☐ Website URL(s): _____
☐ Social Media website URL(s): _____
☐ Other (specify) _____

¹⁰ The term informational materials includes any oral, visual, graphic, written, or pictorial information or matter of any kind, including that published by means of advertising, books, periodicals, newspapers, lectures, broadcasts, motion pictures, electronic communications, or any means or instrumentality of interstate or foreign commerce or otherwise. Informational materials disseminated by an agent of a foreign principal as part of an activity in itself exempt from registration, or an activity which by itself would not require registration, need not be filed pursuant to Section 4(b) of the Act.

¹¹ See Footnote 2, on page 3.

16. Informational materials will be disseminated among the following groups:

- | | |
|--|---|
| <input type="checkbox"/> Public officials | <input type="checkbox"/> Civic groups or associations |
| <input type="checkbox"/> Legislators | <input type="checkbox"/> Libraries |
| <input type="checkbox"/> Government agencies | <input type="checkbox"/> Educational groups |
| <input type="checkbox"/> Newspapers | <input type="checkbox"/> Nationality groups |
| <input type="checkbox"/> Editors | <input type="checkbox"/> Other (specify) _____ |

17. Indicate the language to be used in the informational materials:

- ☒ English ☐ Other (specify) _____

VI--EXHIBITS AND ATTACHMENTS

18. (a) The following described exhibits shall be filed with a Registration Statement:

Exhibit A- This exhibit, which is filed on Form NSD-3, sets forth the information required to be disclosed concerning each foreign principal named in Item 6.

Exhibit B- This exhibit, which is filed on Form NSD-4, sets forth the information concerning the agreement or understanding between the registrant and the foreign principal.

(b) An Exhibit C shall be filed when applicable. This exhibit, for which no printed form is provided, consists of a true copy of the charter, articles of incorporation, association, constitution, and bylaws of a registrant that is an organization. A waiver of the requirement to file an Exhibit C may be obtained for good cause shown upon written application to the Assistant Attorney General, National Security Division, U.S. Department of Justice, Washington, DC 20530. (See Rule 201(c) and (d)).

(c) An Exhibit D shall be filed when applicable. This exhibit, for which no printed form is provided, sets forth an account of money collected or received as a result of a fundraising campaign and transmitted for a foreign principal. (See Rule 201 (e)).

VII--EXECUTION

In accordance with 28 U.S.C. § 1746, and subject to the penalties of 18 U.S.C. § 1001 and 22 U.S.C. § 618, the undersigned swears or affirms under penalty of perjury that he/she has read the information set forth in this statement filed pursuant to the Foreign Agents Registration Act of 1938, as amended, 22 U.S.C. § 611 *et seq.*, that he/she is familiar with the contents thereof, and that such contents are in their entirety true and accurate to the best of his/her knowledge and belief.

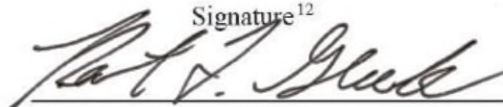
Date

Printed Name

Signature¹²

May 28, 2021

Robert Gluck



¹² This statement shall be signed by the individual agent, if the registrant is an individual, or by a majority of those partners, officers, directors or persons performing similar functions, if the registrant is an organization, except that the organization can, by power of attorney, authorize one or more individuals to execute this statement on its behalf.